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Judy Boley

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FROM:

Ed Springer

January 29, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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MEMORANDUM FOR JUDY BOLEY, FEDERAL COMMUNICATIONS COMMISSION

FROM:

Edward Springer

Ed Springer

00-22911

FEB - 2 2001

SUBJECT:

Comments on Proposed New Information Collection, the ARMIS
Service Quality Reports

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OMB files comments to the Commission on the proposed information collection, the ARMIS Service Quality Reports, received in this office on November 30, 2000 for review pursuant to the Paperwork Reduction Act of 1995.

We are pleased with the Commission's work to simplify and streamline the reporting it imposes on the public generally, and in this particular instance. We compliment the Commission on its willingness to explore many options to reduce the burden imposed and to improve the utility of the collection.

During the course of our review of this collection we received public comments directly from, or submitted on behalf of, 55 small local exchange carriers, AT&T Corporation, the U. S. General Services Administration, the Florida Public Service Commission, and Susan J. Bahr.

Many of the comments we received raised concerns with expanding the application of the report beyond the current 12 large LECs to 1,300 small and rural exchange carriers. They contend that this requirement would impose a significant burden and cost on the small LECs, and that the FCC has not provided a justification for this extension. In their comments, the Rural Local Exchange Carriers estimate that this new requirement would consume 1 to 2 hours a day, or between 260 and 520 hours per year for an average carrier at a cost of \$7,800.

The justification provided for this expansion is that the NARUC Service Quality White Paper concludes that service data quality would be more meaningful for all interested parties, including consumers and state commissions, if all LEC reported such data. In its public notice, the Commission specifically solicited comments on the costs and benefits of this proposal. The comments we received show a considerable cost for the reporting requirement, but do not include discussion of benefits. Absent a significant benefit being shown, we do not approve the extension in this proposal pursuant to the Paperwork Reduction Act.

We also received a number of comments concerning the proposal to eliminate many of the current reporting requirements. The Florida Public Service Commission said that they actively use the information reported on the current Service Quality Report, and that the proposed elimination of reporting requirements would seriously inhibit their use of ARMIS. In addition, the General Services Administration and AT&T Corporation said that they use the current reports to assist in their contractual relationships with the LECs and that the streamlined reports would not provide them sufficient information for their purposes.

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As noted earlier, we are pleased that the Commission is exploring ways to reduce the information collection burden this collection imposes. In the case of streamlining service quality reporting, however, there is a concern that elimination of some reports may provide a false sense of burden reduction. If, State Public Service Commissions will have difficulty carrying-out their oversight function without these reports, then they and other Commissions might be forced to impose their own reporting requirements on the LECs. Such requirements will run a high risk of being unique to each State Commission, and result in the same basic information, being asked for by each Commission in a slightly different way or format -- with the net effect of a greater burden on the LECs. Similarly, the customer needs of inter-exchange carriers (such as AT&T) and large independent customers (such as GSA) may result in additional burden on the LECs. We believe that the Commission is in the best position to explore the likelihood of such replacement reporting and should consider this potential in its deliberations of this proposal.